

PSJ3

Exhibit 683

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 IN RE NATIONAL PRESCRIPTION MDL No. 2804
5 OPIATE LITIGATION Case No. 17-MD-2804
6 This Document Relates to: Judge Dan Aaron Polster
7 The County of Summit, Ohio,
8 et al., v.
9 Purdue Pharma L.P., et al.
10 Case No. 17-op-45004
11 The County of Cuyahoga v.
12 Purdue Pharma L.P., et al.
13 Case No. 18-op-45090
14 City of Cleveland, Ohio v.
15 Purdue Pharma L.P., et al.
16 Case No. 18-op-45132

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18
19 TUESDAY, JANUARY 22, 2019

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21 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
22 CONFIDENTIALITY REVIEW
23 - - -

24 Videotaped deposition of EMILY HALL, held at
25 Foley & Lardner LLP, One Biscayne Tower, 2
26 Biscayne Boulevard, Suite 1900, Miami, Florida,
27 commencing at 9:15 a.m., on the above date,
28 before Kelly J. Lawton, Registered Professional
29 Reporter, Licensed Court Reporter, Certified
30 Court Reporter.

31 - - -

32 GOLKOW LITIGATION SERVICES
33 877.370.3377 ph | 917.591.5672 fax
34 deps@golkow.com

1 somebody -- if somebody ordered past their limit --
2 let's say their limit is 5,000 units. If a customer
3 tried to order 6,000 units, is that a suspicious
4 order?

5 A. A customer cannot order past their limit.

6 Q. Okay. And if they attempt to order past
7 their limit, what happens then?

8 A. They can't.

9 Q. Does that ever get reported in any system?

10 A. No.

11 Q. Does that order ever get referred to the DEA
12 as suspicious?

13 A. Not that I'm aware of.

14 Q. What is the purpose of the control limit?

15 A. It's a comfort level for us to give them a
16 specific quantity for a family based on when we set
17 them up and we did the review on them.

18 Q. Is the control limit mechanism in which Anda
19 can avoid shipping suspicious orders?

20 MS. KOSKI: Object to form.

21 THE WITNESS: Can you please clarify?

22 BY MR. STOLTZ:

23 Q. Is the control limit purpose to avoid
24 shipping suspicious orders to customers?

1 A. Correct.

2 Q. Would that be a suspicious order?

3 MS. KOSKI: Object to form.

4 THE WITNESS: No. The limit is set. So they
5 cannot go past that limit unless it's requested.

6 BY MR. STOLTZ:

7 Q. Right. I understand why the limit is set.
8 The limit is set to prevent pharmacies from ordering
9 more than their limit, correct?

10 A. If they attempted -- if they had a 1,000
11 limit family and they attempted to order 100,000,
12 they would not be able to.

13 Q. They would not be able to?

14 A. They have a hard stop, yes.

15 Q. And that would not be reported to the DEA?

16 A. No.

17 Q. I'm going to show you what's been marked as
18 Exhibit 7.

19 (Anda - Hall Exhibit 7 was marked for
20 identification.)

21 MR. STOLTZ: Bates number 137399.

22 BY MR. STOLTZ:

23 Q. Do you recognize this e-mail from Mary Barber
24 to you?